

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:19-CR-805-RWS-NAB
)	
BRANDON WHITE,)	
)	
Defendant.)	

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Allison H. Behrens, Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate Judge pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with violating Title 18, United States Code, Section 922(g).
2. Defendant was serving a term of probation at the time he engaged in the conduct giving rise to the indictment.
3. While illegally possessing a firearm, Defendant discharged the firearm, striking victim A.G. in the left chest area. Victim A.G. was transported to the hospital for treatment, where he was classified in critical and unstable condition, though death was not imminent. Victim A.G. is recovering from the shotgun wound.

4. Accordingly, there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Allison H. Behrens
ALLISON H. BEHRENS, #38482MO
Assistant United States Attorney